

RUBIN LLC
Attorneys at Law

345 Seventh Avenue, 21st Floor
New York, New York 10001
www.rubinlawllc.com

PAUL A. RUBIN
prubin@rubinlawllc.com

Telephone: 212.390.8054
Facsimile: 212.390.8064

July 3, 2025

Via ECF
Honorable Sean H. Lane
United States Bankruptcy Court
for the Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: In re Viewstar LLC; Case No. 24-22716-shl

Dear Judge Lane:

This firm is counsel to Viewstar LLC (the “Debtor”), the debtor in the above-referenced chapter 11 case. On July 3, 2025, the Debtor filed the *Joint Plan of Reorganization for Viewstar LLC* (the “Plan”) [ECF No. 103] and the *Disclosure Statement for Joint Plan of Reorganization for Viewstar LLC* (the “Disclosure Statement”) [ECF No. 104]. The Plan is proposed by the Debtor and the Debtor’s senior mortgagee, RREF IV-D SN Portfolio LLC (the “Senior Mortgagee,” and together with the Debtor, collectively, the “Plan Proponents,” and each a “Plan Proponent”).

We respectfully submit this letter pursuant to the Court’s General Order M-634 establishing the *Procedural Guidelines for Combined Disclosure Statement and Chapter 11 Plan, Combined Hearings on Approval of Disclosure Statement and Confirmation of Chapter 11 Plan, and Conditional Approval of Disclosure Statement*, dated May 31, 2024 (the “Guidelines”) to (1) provide the information required under Paragraph (c)(i) of the Guidelines, (2) request, pursuant to Paragraph (c)(ii) of the Guidelines that the Court excuse the Debtor from scheduling a pre-motion conference, and (3) request that the Court either enter an order in the form annexed hereto, approving the Disclosure Statement on a conditional basis and scheduling a hearing to consider final approval of the Disclosure Statement and confirmation of the Plan, or to the extent the Court feels necessary, enter an order authorizing the Debtor to file a motion (the “Motion”) for conditional approval of the Disclosure Statement, and scheduling a joint hearing to consider final approval of the Disclosure Statement and confirmation of the Plan, and approving solicitation procedures and forms of ballots and notices. The Plan Proponents believe that a combined Disclosure Statement and confirmation hearing on the Plan will streamline and expedite the plan confirmation process in this single asset Chapter 11 case involving vacant property, which will assist in minimizing the incurrence of additional administrative expenses against Debtor’s estate.

July 3, 2025

Page 2

In accordance with Paragraph (c)(1) of the Guidelines, the Debtor provides the following disclosures:

- (A) The Plan Proponents will seek to confirm the Plan pursuant to 11 U.S.C. § 1129(b) in the event that the requirements of 11 U.S.C. § 1129(a)(8) are not satisfied because at least one class of claims or interests has voted to reject the Plan or is deemed not to have accepted the Plan under 11 U.S.C. § 1126(g).
- (B) The Plan Proponents will seek limited non-consensual third-party releases and injunctions for the benefit of the Senior Mortgagee, the Junior Mortgagee, and the Disbursing Agent (as defined in the Plan).
- (C) The Plan does not provide for differing treatment to any class or parties in interest on the basis of whether such class or party votes to accept or reject the Plan.
- (D) The Plan seeks to settle claims of the Debtor's estate against 10 Mountainview LLC and Moshe Gold, who are insiders of the Debtor.
- (E) The Plan does not seek to settle any claims against third parties without such third party's consent or deemed consent.
- (F) The Plan Proponents will be seeking to expedite the notice periods for consideration of the Disclosure Statement and confirmation of the Plan under Federal Rule of Bankruptcy Procedure 2002 and 3017.
- (G) The Plan Proponents seek to obtain the Court's conditional approval of the Disclosure Statement before its service on parties in interest, the solicitation of ballots, and notice of the combined hearing on final approval of the Disclosure Statement and confirmation of the Plan.

Based on the foregoing, the Debtor respectfully requests that the Court either enter the attached proposed order conditionally approving the Disclosure Statement and setting a combined hearing on final approval of the Disclosure Statement and confirmation of the Plan, or authorize the Debtor to file the Motion and schedule an expedited hearing thereon.

Respectfully submitted,

RUBIN LLC

By: /s/ Paul A. Rubin
Paul A. Rubin

Encl.

RUBIN LLC